

# **Exhibit B**

Nobakht, Nick

November 19, 2014

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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

- - - - - x

WINFRED MUCHIRA, :

Plaintiff, :

vs. :Docket No.:

HALAH AL-RAWAF, et al., :1:14-cv-0770(AJT/JFA)

Defendants :

- - - - - x

Washington, D.C.

Wednesday, November 19, 2014

Video deposition of NICK NOBAKHT, held  
at the Law Offices of Shearman & Sterling, 801  
Pennsylvania Avenue, N.W., Washington, D.C.  
commencing at 10:10 a.m., before Lohna Esteb, a  
Notary Public in and for the District of Columbia.

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9  
10       Also Present:  
11       Max Wagenblast, Videographer

12  
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1     **of living and she had left.**

2           Q.     Did you make any further visits with the  
3     family after that?

4           A.     **I did, yes.**

5           Q.     When was that?

6           A.     **I guess a few months after that**  
7     **conversation, usually related to landscaping, just,**  
8     **you know, house-related stuff.**

9           Q.     Did there come a time when the two-year  
10    lease was about to expire?

11          A.     **I'm sorry, can you repeat the question?**

12          Q.     After these visits --

13          A.     **Right.**

14          Q.     -- I think you said earlier that the lease  
15    that you signed, you and your wife signed, with the  
16    family was for two years?

17          A.     **Yes, it was.**

18          Q.     When was that lease supposed to expire?

19          A.     **In October of this year of 2014.**

20          Q.     Did you have any discussions with the  
21    family about what they were going to do about the  
22    expiration of the lease?

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1           A.    I didn't. But he initiated the  
2 conversation in August. It was actually nice of him  
3 because he was in Saudi Arabia. He called me up, he  
4 said that they were not going to extend the lease,  
5 and that if we wanted to put the house up for sale  
6 or for rent, we could go ahead and do so, and that  
7 they wouldn't mind moving out earlier in case we  
8 found a buyer or another renter.

9           Q.    By he, you mean Fahad?

10          A.    Fahad Al-Rashoudi, yes.

11          Q.    Did you have any conversations at any  
12 point with an Ibrahim Al-Rashoudi?

13          A.    No, I did not.

14          Q.    Did you have any conversations with any  
15 other member of the family other than the four  
16 tenants?

17          A.    No, I did not.

18          Q.    When Fahad Al-Rashoudi made this call from  
19 Saudi Arabia in August, what did you tell them?

20          A.    I told them I appreciated it and -- that  
21 he had given me the heads up, and I wished him good  
22 luck. He said that the mother and the -- the older

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1     sister Luluh, they had decided to stay in Saudi  
2     Arabia, and that Fahad and Sarah were the only ones  
3     going back to the U.S. to continue their studies and  
4     that they didn't need a 9,000 square foot home; they  
5     just wanted an apartment.

6           Q.     Did you have any subsequent conversations  
7     with Fahad Al-Rashoudi or any member of the family?

8           A.     After that conversation, yeah, plenty of  
9     times, just back and forth as far as when they were  
10    going to move their stuff out. And then in one of  
11    those conversations, that's when he brought up the  
12    subject of this lady filing a lawsuit against them.

13          Q.     By this lady, you mean Ms. Muchira?

14          A.     Yes, Ms. Muchira, yeah. Muchira.

15          Q.     What did he tell you about that?

16          A.     He said that she had claimed that she was  
17    imprisoned and, you know, a bunch of other claims, I  
18    guess. And because of that, they could not come  
19    back to the U.S. for the time being until they  
20    resolved the matter.

21          Q.     Were you surprised by what he told you?

22          A.     Very much so, yes.